

REMARKS

After entering the above amendments, claims 1-7 and 12-22 will be pending. Reconsideration and allowance of the current application are requested in light of the above-marked amendments and the foregoing remarks.

Summary of Rejections. The Office has rejected claims 1-7 and 19-21 under 35 U.S.C. §101 as allegedly being drawn to non-statutory subject matter; and claims 1-7 and 12-21 under 35 U.S.C. §103(a) as allegedly being unpatentably obvious over US2002/0161688 by Stewart (“Stewart”) in view of US6,085,030 to Whitehead (“Whitehead”).

Summary of Amendments. With this amendment, independent claims 1, 12, and 21 have been amended. The limitations pertaining to the integration repository comprising a plurality of business scenarios are disclosed at least in paragraph [0025]. The landscape directory providing a description of an active system landscape is disclosed at least at paragraph [0031]. The functions of the business process logic, the routing rules, and the executable mapping are disclosed at least in FIG. 3 and FIG. 4 and in paragraphs [0039], [0041], and [0052]. New claim 22, which is supported at least at paragraph [0032] has been added.

The amendments and new claims are fully supported by the original specification. No new matter has been added.

Rejections under 35 USC §101

Claims 1-7, and 19-21 stand rejected under 35 U.S.C. §101, because the Office alleges that the claims are drawn to unpatentable subject matter. This rejection is respectfully traversed.

With regards to claim 1, the Office appears to allege that “an integration server implemented on a processor” is not statutory subject matter. While disagreeing with the Office’s position, Applicant has amended claim 1 to recite “a processor implementing an integration server” in an

effort to further prosecution in this matter. Claims 2-7 and 19-20 all depend from and include the limitations of claim 1 and are therefore submitted to also recite statutory subject matter.

With regards to claim 21, the Office has alleged that an “article” does not belong to one of the statutory classes and that a machine-readable medium can be a piece of paper. Claim 21 has been amended to recite an article of manufacture, which Applicant submits is within the statutory classes covered by 35 U.S.C. §101. Machine-readable medium” is clearly defined at paragraph [0055] of the specification and explicitly does not include a piece of paper as proffered by the Office.

For at least these reasons, withdrawal of the pending rejection under 35 U.S.C. §101 is respectfully requested.

Rejections under 35 USC §103

Claims 1-7 and 12-21 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentably obvious over Stewart in view of Whitehead. This rejection is respectfully traversed. For a proper rejection under 35 U.S.C. §103(a), the Office “bears the initial burden of factually supporting any *prima facie* conclusion of obviousness” and must therefore present “a clear articulation of the reason(s) why the claimed invention would have been obvious.” MPEP §2142. An obviousness rejection “cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness.” MPEP §2141 quoting *KSR International Co. v. Teleflex Inc.*, 82 USPQ2d 1386, 1385 (2007). This rationale must include a showing that all of the claimed elements were known in the prior art and that one skilled in the art could have combined the elements as claimed by known methods with no change in their respective functions, to produce a combination yielding nothing more than predictable results to one of ordinary skill in the art. *KSR*, 82 USPQ2d at 1395. MPEP §2141.02 further notes that “a prior art reference must be considered in its entirety, i.e., as a whole,

including portions that would lead away from the claimed invention. *W.L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984). The rejections over Stewart and Whitehead fail to satisfy this burden with regards to the currently pending claims.

The Office has alleged that Whitehead's description of a "component consumer application 210 used by a client" (as shown in FIG. 2) is a sufficient disclosure of "a system landscape directory listing one or more installed applications with which the integrated message system communicates."

The applicable section of claim 1 has been amended as follows:

a system landscape directory that provides a description of an active system landscape and identifies a configuration-specific business scenario that is consistent with the active system landscape, the active system landscape comprising two or more installed applications with which the integrated message system communicates;

The "component consumer application" of Whitehead does not actually provide a description of the active system landscape as defined in claim 1 as currently presented. Rather, as described at col. 10, lines 16-58, a user makes a request for a component, and the component registry 400 and the description registry 410 are consulted to determine if the component is available. In this manner, the Whitehead subject matter provides "a la carte" access to a menu of available components, but never actually makes use of a business scenario that is identified based on an active system landscape and that specifies the business process logic, routing rules, and mapping rules to be used for communication between the two or more installed applications in the active system landscape. As Stewart also fails to disclose this feature, the currently cited prior art does not provide sufficient grounds for a rejection of claim 1 under 35 U.S.C. §103(a).

Claim 1 has also been amended to recite a runtime engine that is defined as follows:

a runtime engine comprising a business process engine that executes the business process logic defined in the configuration-

specific business scenario on the message if the at least one sending application and/or the one or more receiving applications require business process logic, the runtime engine further comprising a logical routing service that evaluates routing rules defined in the configuration-specific business scenario to determine one or more required interfaces for the one or more receiving applications and also to determine whether business logic needs to be applied to the message, and a mapping service that applies mapping rules defined in the configuration-specific business scenario to determine one or more required transformations to the message that depend on the message content, the at least one sending application, and/or the one or more receiving applications,

Neither Stewart nor Whitehead disclose or suggest the function of determining one or more required transformations to a message that depend on message content and/or the sending and receiving applications. Both cited references are also silent on the recited limitation that a configuration-specific business scenario defines mapping rules that are applied to determine the required transformations. Furthermore, Whitehead specifically teaches away from this limitation, at for example col. 10, lines 1-26. This passage discloses that Whitehead's system ensures that "consistent interfaces, properties, versions, and implementations between components so that all instances of a component type are guaranteed to share the same characteristics." The currently claimed subject matter as recited above includes making transformations to the message being sent to map the message to the sending and/or receiving application. Thus even if the Office continues to contend that Stewart and Whitehead disclose all of the features of the currently claimed subject matter, the cited references are not properly combinable as asserted in the most recent Office Action in this matter.

Additionally, the presented amendments to claim 1 also add the following limitation that is not disclosed or suggested by Stewart or Whitehead, either individually or in combination:

an integration repository comprising a plurality of design-time business scenarios, the one or more design-time business scenarios each describing and configuring message-based interaction between application components or enterprises based on a set of business

process logic, routing rules, and executable mappings defined by the design-time business scenario

The Office has alleged that Whitehead's disclosure of "a component registry" is equivalent to the claimed "integration repository." While Applicant disagrees with this characterization in light of the previously presented claims, the above-noted additional limitations have also been added in an effort to further prosecution in this matter. It is respectfully submitted that neither Stewart nor Whitehead can accurately be alleged to disclose an integration repository that lists more than one business scenario, each of which describes and configures message-based interaction between application components or enterprises based on sets of business process logic, routing rules, and executable mappings that are defined at design-time. Whitehead's "component registry" merely permits a consumer user to locate a heterogeneous component and to make use of the component by providing an interface between the consumer object model and the component object model. This function does not correspond to the definition of a full business scenario that defines interactions between more than one application source in terms of business logic, routing rules, and executable mappings. As such, Whitehead and Stewart cannot properly be asserted to render this claim element obvious.

Claims 12 and 21 have been amended to include similar limitations as those discussed above for claim 1. The remaining claims all depend from one of the independent claims and therefore also include the limitations thereof. For at least these reasons, withdrawal of the pending rejections under 35 U.S.C. §103(a) is respectfully requested.

CONCLUSION

On the basis of the foregoing amendments, the pending claims are in condition for allowance. It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper.

The Commissioner is hereby authorized to charge any additional claim fees and any additional fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-061/2003P00050US01. If there are any questions regarding this reply, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

Respectfully submitted,

Date: August 4, 2008



Michael D. Van Loy
Reg. No. 52,315

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.
3580 Carmel Mountain Road, Suite 300
San Diego, CA 92130
Customer No. 64280
Tel: 858/314-1559
Fax: 858/314-1501